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11 Jeffery Price, Justin Birkhofer on their own behalf,
12 and on behalf of all others similarly situated*

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22 *Attorneys for Defendants Sunrun Inc. Inc. and Clean
23 Energy Experts, LLC*

24 [other counsel in signature block]

25 **UNITED STATES DISTRICT COURT**

26 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND**

27 LYNN SLOVIN, an individual, on her own
28 behalf and on behalf of all others similarly
situated,

29 Plaintiff,

30 v.

31 SUNRUN, INC., a California corporation,
32 CLEAN ENERGY EXPERTS, LLC, a
33 California limited liability company doing
34 business as SOLAR AMERICA, and DOES 1
35 through 5, inclusive,

36 Defendants.

37 Case No. 4:15-cv-05340-YGR

38 (Hon. Yvonne Gonzalez Rogers)

39 **STIPULATION TO CONTINUE DATES**

40 TAC Filed: July 12, 2016
41 Trial Date: None Set

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45 **STIPULATION TO CONTINUE DATES**

1 Plaintiffs Lynn Slovin, Samuel Katz, Jeffrey Price, and Justin Birkhofer (“Plaintiffs”) and
2 Defendants Sunrun Inc. and Clean Energy Experts, LLC (“Defendants”) (collectively, the
3 “Parties”), by and through their respective counsel, hereby stipulate as follows:

4 WHEREAS the Case Management Conference was held in this matter on November 14,
5 2016 and a Case Management and Pretrial Order issued setting deadlines for the motion for class
6 certification; the exchange of expert reports; and a settlement conference (Dkt. No. 70);

7 WHEREAS the Court scheduled a settlement conference with Magistrate Judge Maria-
8 Elena James for February 14, 2017 and an ADR compliance deadline of February 24, 2017 (Dkt.
9 No. 71);

10 WHEREAS, at the end of January 2017, Defendants produced their call detail records;

11 WHEREAS Plaintiffs sought to postpone the February 14, 2017 settlement conference to
12 obtain additional time for Plaintiffs’ expert to analyze these call detail records and Defendants
13 agreed not to oppose any postponement;

14 WHEREAS when Plaintiffs sought to postpone the settlement conference to March 2017,
15 the Honorable Maria-Elena James had no availability until May 2017 and the Deputy Clerk to the
16 Honorable James vacated the February 14, 2017 settlement conference (Dkt. No. 82);

17 WHEREAS the parties sought to proceed with ADR prior to May 2017 and have secured a
18 private mediation with Hon. Edward Infante (Ret.) scheduled for March 7, 2017;

19 WHEREAS the parties have diligently engaged in discovery, including having taken
20 multiple depositions in February 2017 and have additional depositions scheduled for the end of
21 February 2017 and in March 2017;

22 WHEREAS the parties believe that they will engage in additional discovery through
23 Spring of 2017 and that a short continuance of the current deadlines in this matter is warranted and
24 will increase the likelihood that any future settlement conference will be successful;

25 IT IS HEREBY STIPULATED AND AGREED that, subject to Court approval, the current
26 deadlines set in this matter be vacated and re-set as follows:
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Event	Original Deadline	Requested Deadline
Settlement Conference	February 14, 2017	March 7, 2017 (Scheduled date with Hon. J. Infante)
Completion Date		
ADR Compliance Filing	February 24, 2017	March 14, 2017
ADR Compliance Hearing	March 3, 2017 at 9:01 a.m.	TBD
Plaintiff Expert Report Due	March 31, 2017	May 26, 2017
Defendant Expert Report Due	May 1, 2017	June 26, 2017
Rebuttal Expert Reports	May 22, 2017	July 17, 2017
Deadline to File Class Certification Motion	July 3, 2017	August 28, 2017
Class Certification Hearing	August 8, 2017	October 3, 2017 or such other date convenient with the Court

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15 DATED: February 24, 2017

PARISI & HAVENS LLP

David C. Parisi

Suzanne Havens Beckman

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17 PARASMO LIEBERMAN LAW

Yitzchak H. Lieberman

18
19 By: /s/ David C. Parisi

David C. Parisi

20 Attorneys for Plaintiffs

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22 DATED: February 24, 2017

KELLEY DRYE & WARREN LLP

23 Lauri A. Mazzuchetti

24 Edward Mullins

Lee S. Brenner

Catherine D. Lee

25
26 By: /s/ Lauri A. Mazzuchetti

Lauri A. Mazzuchetti

27 Attorneys for Defendants Sunrun Inc. and
28 Clean Energy Experts, LLC

1 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I attest that all other signatories listed, and on
2 whose behalf the filing is submitted, concur in the filing of this stipulation and have authorized the
3 filing of this stipulation.

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5 DATED: February 24, 2017

PARISI & HAVENS LLP

6 David C. Parisi

Suzanne Havens Beckman

7

PARASMO LIEBERMAN LAW

8 Yitzchak H. Lieberman

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10 By: /s/ David C. Parisi

David C. Parisi

11 Attorneys for Plaintiffs

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